

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:)	Chapter 11
)	
W.R. Grace & Co., et al., ¹)	Case No. 01-1139 (JKF)
)	Jointly Administered
)	
Debtors.)	
)	
)	

**Expert Witness Disclosure of William G. Hughson, M.D., D., Phil.
Pursuant To Federal Rule Of Civil Procedure 26 (a)(2)**

I submit this report on behalf of W.R. Grace & Co., et al. ("Debtors").

Background and Qualifications:

I am the Director of the University of California San Diego ("UCSD")
Center for Occupational and Environmental Medicine and Clinical Professor of
Medicine at UCSD Medical Center, 200 West Arbor Drive, San Diego, California
92103-8800. I am also an Adjunct Associate Professor at the San Diego State
University Graduate School of Public Health.

¹ The Debtors consist of the following 62 entities: W.R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc.), W.R. Grace & Co.-Conn., A-1 Bit & Tool Co., Inc., Alewife Boston Ltd., Alewife Land Corporation, Amicon, Inc., CB Biomedical, Inc. (f/k/a Circe Biomedical, Inc.), CCHP, Inc., Coalgrace, Inc., Coalgrace II, Inc., Creative Food-N-Fun Company, Darex Puerto Rico, Inc., Del Taco Restaurants, Inc., Dewey and Almy, LLC (f/k/a Dewey and Almy Company), Ecarg, Inc., Five Alewife Boston, Ltd., G C Limited Partners I, Inc. (f/k/a Grace Cocoa Limited Partners I, Inc.), G C Management, Inc. (f/k/a Grace Cocoa Management, Inc.), GEC Management Corporation, GN Holdings, Inc., GPC Thomasville Corp., Gloucester New Communities Company, Inc., Grace A-B, Inc., Grace A-B II, Inc., Grace Chemical Company of Cuba, Grace Culinary Systems, Inc., Grace Drilling Company, Grace Energy Corporation, Grace Environmental, Inc., Grace Europe, Inc., Grace H-G Inc., Grace H-G II Inc., Grace Hotel Services Corporation, Grace International Holdings, Inc., (f/k/a Dearborn International Holdings, Inc.), Grace Offshore Company, Grace PAR Corporation, Grace Petroleum Libya Incorporated, Grace Tarpon Investors, Inc., Grace Ventures Corp., Grace Washington, Inc., W.R. Grace Capital Corporation, W.R. Grace Land Corporation, Gracoal, Inc., Gracoal II, Inc., Guanica-Caribe Land Development Corporation, Hanover Square Corporation, Homco International, Inc., Kootenai Development Company, L B Realty, Inc., Litigation Management, Inc. (f/k/a GHSC Holdings, Inc.), Grace JVH, Inc., Asbestos Management, Inc.), Monolith Enterprises, Incorporated, Monroe Street, Inc., MRA Holdings Corp. (f/k/a Nestor-BNA Holdings Corporation), MRA Intermedco, Inc. (f/k/a Nestor-BNA, Inc.), MRA Staffing Systems, Inc. (f/k/a British Nursing Association, Inc.), Remedium Group, Inc. (f/k/a Environmental Liability Management, Inc.), E&C Liquidating Corp., Emerson & Cuming, Inc.), Southern Oil, Resin & Fiberglass, Inc., Water Street Corporation, Axial Basin Ranch Company, CC Partners (f/k/a Cross Country Staffing), Hayden-Gulch West Coal Company, H-G Coal Company.

I am a medical doctor and am board certified in internal medicine, pulmonary medicine and occupational medicine. I have also received a doctorate degree in epidemiology from Oxford University, where I studied as a Rhodes Scholar under Sir Richard Doll, one of the foremost epidemiologists in the world.

I have had extensive experience in the evaluation and treatment of patients who have been exposed to asbestos. Since 1980, I have administered a program to screen workers at the National Steel and Shipbuilding Company in San Diego for asbestos-related disease which has performed approximately 1,000 evaluations. In addition, since 1985, I have served as the UCSD Medical Director for Employee Health Services with responsibility for monitoring the health of workers exposed to asbestos containing materials and advising with respect to removal and renovation projects. I have also been involved in screening and evaluation programs for various other workers with potential asbestos exposure.

I have extensively reviewed the medical literature concerning asbestos-related disease. I keep abreast of the current scientific and medical literature on the subject by reading numerous academic journals, undertaking continuing medical education, and accessing other available materials through the National Library of Medicine. All of this reading over the course of my professional career, together with my actual clinical experience and supervisory responsibilities as relates to asbestos, provide the basis for my expert opinions as expressed in this report.

A fuller statement of my background and experience is set forth in the attachments to this statement. These include a copy of my current curriculum vitae ("Attachment A") which lists all my publications and a listing of prior deposition and trial testimony for the last four years ("Attachment B").


The only way from a medical standpoint to determine whether an asbestos-containing material or asbestos handling activity constitutes a health risk is to conduct air sampling during the operation in question and then measure the concentration of any released fibers. Attempts to substitute for this purpose ASTM developed surface dust sampling techniques -- expressed in terms of structures per square centimeter to which are added arbitrarily set breakdowns for various levels of "contamination" -- are absolutely meaningless from a health perspective where the only thing that matters is what's in the air that enters the lung. I know of no reputable scientific or medical authority that thinks otherwise, including ASTM.

Mostly from my experience as an expert witness in adversarial proceedings like this one, I am of course aware of assertions by certain witnesses that there is no safe level of exposure to asbestos as even more extremely expressed in terms of "one fiber can kill." These statements derive from wholly speculative linear extrapolations downward from historic levels of occupational exposure orders of magnitude beyond anything encountered today. And while EPA and OSHA may pay them lip service in regulatory preambles, when either agency has been called upon to balance such theory against the practical realities of dealing with asbestos-containing materials, pragmatism has

always won out. The fact that both agencies see no need to remove properly maintained asbestos-containing materials and approve recommended work practices which significantly limit but do not necessarily exclude the possibility of fiber release illustrates the point.

For a fuller description of the potential scope of my testimony, the specific opinions I hold and the basis for those opinions, reference is invited to my deposition and hearing testimony in Armstrong World Industries, Inc., et al., Debtors, copies of which will be made available on request. I also reserve the right to add to these opinions as appropriate and within my area of expertise to address views expressed in the expert reports of any other opposing experts which I understand will be simultaneously exchanged with my own. Finally, in any live testimony, I anticipate using flip charts and hand drawings to illustrate various epidemiologic principles, including the incidence of mesothelioma in this country over time and the fallacy of extrapolating from high occupational exposures known to cause asbestos related disease to the much lower levels conceivably of concern here.

For the time spent on this matter as a designated expert, I charge my customary rate of \$500 per hour. I am also reimbursed for my reasonable and necessary expenses.



William G. Hughson, M.D., D. Phil
October 12, 2005

C U R R I C U L U M V I T A E

HUGHSON, WILLIAM G.

Date of Birth: January 7, 1951
Place of Birth: Calgary, Alberta, Canada
Marital Status: Married - Joanne Lloyd Hughson

EDUCATION

- 1968: Graduated from secondary education with a first-class diploma.
- 1968-70: Enrolled in the Faculty of Arts and Science of the University of Calgary in pre-medical studies. Academic record of 4.0 grade-point average.
- 1970: Entered the Faculty of Medicine of the University of Calgary. Graduated 1973.

POST GRADUATE TRAINING

Straight Intern (Medicine) at the Royal Victoria Hospital, Montreal.	July 1973-June 1974
Resident in Obstetrics and Gynecology at the Foothills Hospital, Calgary.	July 1974-Oct. 1974
Department of Social and Community Medicine, Oxford University. Completed a Doctor of Philosophy degree. Title of thesis "A study of Some Aspects of the Epidemiology and Treatment of Peripheral Vascular Disease".	Oct. 1974-Sept. 1977
Resident III in Medicine at the Royal Victoria Hospital, Montreal.	Oct. 1977-June 1978
Resident IV in Medicine at the Royal	July 1978-June 1979

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Victoria Hospital, Montreal.

First-year Fellow in the Division of
Pulmonary Medicine and Critical Care
Medicine. University of California,
San Diego.

July 1979-June 1980

Second-year Fellow in the Division of
Pulmonary Medicine and Critical Care
Medicine. University of California,
San Diego.

July 1980-June 1981

Third-year Fellow in the Division of
Pulmonary Medicine and Critical Care
Medicine. University of California,
San Diego.

July 1981-June 1982

BOARD CERTIFICATIONS AND QUALIFICATIONS

Board Certified, American College of
Physicians. Specialty in Internal
Medicine.

1979

Fellow, Royal College of Physicians
and Surgeons of Canada. Specialty
in Internal Medicine.

1979

Board Certified, American College of
Physicians. Specialty in Pulmonary
Medicine.

1982

Certified NIOSH "A" Reader.

1982

Board Certified, American Board of
Preventive Medicine. Specialty in
Occupational Medicine.

1987

APPOINTMENTS

Assistant Clinical Professor of

July 1982-June 1990

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Medicine. University of California,
San Diego.

Director, UCSD Center for Occupational
& Environmental Medicine.

January 1984-present

Independent Medical Examiner for the
Division of Industrial Accidents for
the State of California.

January 1984-1995

Medical Director, UCSD Employee
Health Program.

September 1985-present

Lecturer, Graduate School of Public
Health, San Diego State University.
Teaching PH 635, Occupational Medicine.

1987 & 1988

Associate Clinical Professor of
Medicine. University of California,
San Diego.

July 1990-June 1996

Associate Adjunct Professor, Division
of Occupational and Environmental Health,
Graduate School of Public Health,
San Diego State University.

August 1991-August 2000

Qualified Medical Evaluator, State of
California.

1995-1998

Clinical Professor of Medicine.
University of California, San Diego.

July 1996-present

Adjunct Professor, Division of
Occupational and Environmental Health,
Graduate School of Public Health,
San Diego State University.

August 2000-present

ACADEMIC AWARDS

University Honor Prize	1969
Viscount Bennett Scholarship	1969
Imperial Oil Scholarship (full tuition)	1969-1972
Teagle Foundation Scholarship	1969-1973
Rhodes Scholarship for Alberta	1974

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PROFESSIONAL ORGANIZATIONS

American Association of Rhodes Scholars
American College of Occupational and Environmental Medicine
American College of Chest Physicians
American College of Physicians
American Thoracic Society
California Thoracic Society
Canadian Association of Rhodes Scholars
Royal College of Physicians & Surgeons of Canada
Western Occupational and Environmental Medical Association

COMMITTEES

Member, Occupational Medicine Scientific Committee. California Medical Association.	July 1985-July 2002
Member, Environmental and Occupational Health Committee. American Lung Association of California.	July 1985-present
Member, Executive Committee of the San Diego Pulmonary Society. Society President 1988-1989.	1985-1989
Member, Occupational Health Training Advisory Board. San Diego State University.	1986-present
Member, Committee for Clinical Affairs. UCSD Division of Pulmonary and Critical Care Medicine.	1987-1998
Member, Science Resources Panel. Subcommittee of Quality of Life Board advising the City of San Diego regarding the Sander Trash-to-Energy Project.	February 1987-June 1988
Chairman, UCSD Medical Ethics Committee.	July 1988-June 1990
Member, UCSD Health and Safety Advisory	August 1988-present

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Council.

Member, Preventive Pulmonary Education
Committee.

July 1989-1998

Member, UCSD Medical Center Safety
Management Program Committee.

July 1989-present

Member, Subcommittee on Non-Biological
Contaminants. Subcommittee of the Toxic
Waste Advisory Committee of the Port
of San Diego, dealing with pollution
problems in San Diego Bay.

August 1989-August 1990

Chairman, UCSD Medical Center Bylaws
Committee.

July 1991-June 1994

Member, UCSD Administrative Services
QMP Steering Committee.

April 1992-1994

Member, Occupational and Clinical
Toxicology Committee, American College
of Occupational and Environmental Medicine.

April 1993-April 2003

Member, UCSD Department of Medicine
Committee on Appointments and
Promotions (DOMCAP).

April 1997-June 1998

Member, American Lung Association of
California Research Program Research
Training Fellowship Review Committee.

July 1997-present

PUBLICATIONS

1. Hughson WG, Mann JI, Tibbs DJ, Woods HF, Walton I. Intermittent Claudication: Factors Determining Outcome. British Medical Journal 1978;1:1377-1379.
2. Hughson WG, Mann JI, Garrod A. Intermittent Claudication: Prevalence and Risk Factors. British Medical Journal 1978;1:1379-1381.
3. Mann JI, Hughson WG, Holman RR, Honour AJ, Thorogood M, Smith A, Baum JD. Serum Lipids in Treated Diabetic Children and Their Families. Clinical Endocrinology 1978;8:27-33.

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4. Hughson WG, Friedman PJ, Feigin DS, Resnik R, Moser KM. Postpartum Pleural Effusion: A Common Radiographic Finding. *Annals of Internal Medicine* 1982;97:856-858.
5. Guidotti TL, Abraham JL, Hughson WG, Krems AD, Neuman TS, Bryson AL, Heramb BI. Taking the Occupational History. *Annals of Internal Medicine* 1983;99:641-651.
6. Hughson WG. Pleural Diseases Associated with Asbestos: Medical and Legal Implications. *Pulmonary Perspectives* 1985;2(4):6-8.
7. Hughson WG. Evaluation of the Solitary Pulmonary Nodule. Computer program presented at the annual California Medical Association Conference, February 1986.
8. Hughson WG. Occupational Lung Disease. Computer program prepared for Medical Information Diagnostic Systems, Inc., September 1986.
9. Hughson WG. Pulmonary Function Tests. In LaDou J (ed): Occupational Medicine. Norwalk, Connecticut, Appleton & Lange 1990;221-222.
10. Hughson WG. Occupational Asthma. In LaDou J (ed): Occupational Medicine. Norwalk, Connecticut, Appleton & Lange 1990;222-227.
11. Hughson WG. Rehabilitation: Re-entry Into the Workplace After Treatment for Cancer. In Moossa AR, Schimpff SC, Robson MC (eds): Comprehensive Textbook of Oncology. Baltimore, Williams & Wilkins 1991;1820-1823.
12. Hughson WG. Coal Workers Pneumoconiosis. In Bordow RA, Moser KM (eds): Manual of Problems in Pulmonary Medicine, Third Edition. Boston, Little, Brown & Company 1991;357-360.
13. Hughson WG. Pulmonary Disability Evaluations. *Pulmonary Perspectives* 1991;8(4):4-6.
14. Hughson WG. Epidemiologic Considerations in Occupational Asthma. *Immunology and Allergy Clinics of North America* 1992;12:697-710.
15. Mooney V, Hughson WG. Resurgence of Work-Hardening Programs. *Western Journal of Medicine* 1992;156:410.
16. Cox CB, Hughson WG. "Making the Connection". Videotape concerning Occupational Asthma produced for Office of Learning Resources - TV UCSD, Preventive Pulmonary Series, 1993.
17. Hughson WG. Coal Workers Pneumoconiosis. In Bordow RA, Moser KM

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(eds): Manual of Problems in Pulmonary Medicine, Fourth Edition.
Boston, Little, Brown & Company 1996: 367-370.

18. Hughson WG. Occupational Asthma. In Bordow RA, Moser KM (eds): Manual of Problems in Pulmonary Medicine, Fourth Edition. Boston, Little, Brown & Company 1996: 373-376.
19. Hughson WG. Approaches to Occupational-Environmental Lung Disease. In Bordow RA, Moser KM (eds): Manual of Problems in Pulmonary Medicine, Fourth Edition. Boston, Little, Brown & Company 1996: 361-364.
20. Hughson WG, Fedoruk MJ. Occupational and Environmental Causes of Lung Cancer and Esophageal Cancer. In Aisner J, Arriagada R, Green MR, Martini N, Perry MC (eds): Comprehensive Textbook of Thoracic Oncology. Baltimore, Williams & Wilkins 1996:66-89.
21. Fedoruk MJ, Logan DC, McDiarmid MA, Forrester BG, Hughson WG, Holland C, Newby HE, Saunders JH. American College of Occupational and Environmental Medicine (ACOEM) Reproductive Hazard Management Guidelines. *Journal of Occupational and Environmental Medicine* 1996;38:83-90.
22. Hughson WG. Guest Editorial: The Undercover Advocate. *RT/The Journal for Respiratory Care Practitioners.* April/May 1997:18,117.
23. Hughson WG. Occupational and Environmental Medicine in an Academic Medical Center. *Western Journal of Medicine* 1998 (in press).
24. Hughson WG. Silicosis, Coal Workers= Pneumoconiosis and Byssinosis. In Bowler RM, Cone JE (eds): Occupational Medicine Secrets. Philadelphia, Hanley & Belfus 1999: 101-105.
25. Hughson WG. Approaches to Occupational-Environmental Lung Disease. In Bordow RA, Ries AL, Morris TA (eds): Manual of Problems in Pulmonary Medicine, Fifth Edition. Philadelphia, Lippincott, Williams & Wilkins 2001, 415-418.
26. Hughson WG. Coal Workers= Pneumoconiosis. In Bordow RA, Ries AL, Morris TA (eds): Manual of Problems in Pulmonary Medicine, Fifth Edition. Philadelphia, Lippincott, Williams & Wilkins 2001, 421-424.
27. Hughson WG. Occupational Asthma. In Bordow RA, Ries AL, Morris, TA(eds): Manual of Problems in Pulmonary Medicine, Fifth Edition. Lippincott, Williams & Wilkins 2001, 428-431.
28. Hughson WG. Disability and Medicolegal Evaluation. In Bordow RA, Ries

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AL, Morris TA (eds): Manual of Problems in Pulmonary Medicine, Fifth Edition. Philadelphia, Lippincott, Williams & Wilkins 2001, 431-434.

29. Fung F, Hughson WG. Health effects of indoor fungal bioaerosol exposure. *Applied Occupational and Environmental Hygiene* 2003;18:535-544.
30. Fung F, Hughson WG. The fundamentals of mold-related illness. *Postgraduate Medicine Online* June 2003;113, No 6.
31. Hughson WG. Approaches to Occupational-Environmental Lung Disease. In Bordow RA, Ries AL, Morris TA (eds): Manual of Problems in Pulmonary Medicine, Sixth Edition. Philadelphia, Lippincott, Williams & Wilkins 2004, (In Press).
32. Hughson WG. Coal Workers= Pneumoconiosis. In Bordow RA, Ries AL, Morris TA (eds): Manual of Problems in Pulmonary Medicine, Sixth Edition. Philadelphia, Lippincott, Williams & Wilkins 2004, (In Press).
32. Hughson WG. Asbestos-Related Disease. In Bordow RA, Ries AL, Morris TA (eds): Manual of Problems in Pulmonary Medicine, Sixth Edition. Philadelphia, Lippincott, Williams & Wilkins 2004, (In Press).
34. Hughson WG. Occupational Asthma. In Bordow RA, Ries AL, Morris TA (eds): Manual of Problems in Pulmonary Medicine, Sixth Edition. Philadelphia, Lippincott, Williams & Wilkins 2004, (In Press).
35. Hughson WG. Disability and Medicolegal Evaluation. In Bordow RA, Ries AL, Morris TA (eds): Manual of Problems in Pulmonary Medicine, Sixth Edition. Philadelphia, Lippincott, Williams & Wilkins 2004, (In Press).

ABSTRACTS

1. Hughson WG, Lonky SA. The Effect of Exposure to Ozone on the Protease-Antiprotease System of the Dog. *American Review of Respiratory Disease* 1982;125:148.

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ARMSTRONG, D. Veronica (WD: Donald) v. ACandS. Los Angeles Superior Court Case No. BC 269759. Deposition 1-28-05.

ARMSTRONG, William (WD: John) v. ACandS, Inc. Los Angeles Superior Court Case No. BC 271999. Deposition 7-15-05.

ASLANIAN, Varoujan and Diana v. 3 M Company. Los Angeles Superior Court Case No. BC 308960. Deposition 1-14-05.

BIEN, Willie and Bonnie v. American Asbestos Co. . San Francisco Superior Court Case No. 433739. Deposition 2-9-05.

BERRY, Pauline (WD: Dewey) v. A.W. Chesterton Co. San Francisco Superior Court Case No. 404491. Deposition 2-23-05.

BILES, Ronald v. Asbestos Defendants. San Francisco Superior Court Case No. 406249. Deposition 2-11-05.

BLALOCK, Charles v. Asbestos Defendants. . San Francisco Superior Court Case No. 324880. Deposition 8-8-05.

BRUNER, Thomas and Blanche v. American Asbestos Co. San Francisco Superior Court Case No. 431429. Deposition 1-3-05.

BRYSON, Richard (WD: Georgina) v. A.W. Chesterton Co. San Francisco Superior Court Case No. 421730. Deposition 6-2-05.

CAHILL, Robert and Sarah v. Advocate Mines, Inc. San Francisco Superior Court Case No. 434994. Deposition 5-3-05.

CHAMPION, Judge H., et al. v. The Lincoln Electric Company, et al. In the 128th Judicial District Court of Orange County, Texas. Cause No. A-920,967-SC(2). Deposition 4-7-05.

CHULICK, John v. Asbestos Defendants. San Francisco Superior Court Case No. 404829. Deposition 6-7-05.

CLINTON, Bob and Gloria v. American Asbestos Co. San Francisco Superior Court Case No. 433284. Deposition 1-26-05. Trial testimony 2-22-05.

CROCKETT, Raymond v. Garlock Sealing Technologies. In the Circuit Court for the City of Newport News. At Law No. 38356P-03. Deposition 10-11-05.

DAVIS, Arline v. Honeywell International Inc. Alameda County Superior Court Case No. RG04187783. Deposition 8-3-05.

FOWERS, David and Fusano v. 3M Company. Los Angeles Superior Court Case No. BC 318781. Deposition 3-14-05.

GARCIA, Genaro and Delia v. Asbestos Defendants. San Francisco Superior Court Case No. 418098. Deposition 7-11-05.

GIBSON, Rhonda (WD: Ronald Tipton) v. Advocate Mines Limited. San Francisco Superior Court Case No. 425207. Deposition 6-3-05.

GORMAN, Rebecca (WD: McKinley Dorrell) v. Asbestos Defendants. San Francisco Superior Court Case No. 421755. Deposition 8-2-05.

GOUGEON, Helen (WD: James). San Francisco Superior Court Case No. 401427. Deposition 2-24-05.

GRIFFIN, Helen (WD: James) v. Buffalo Pumps, Inc. Los Angeles Superior Court Case No. BC 307 929. Deposition 7-6-05.

GRISEZ, Mark (WD: PADILLA, Charles) v. ACandS Inc. San Francisco Superior Court Case No. 421181. Deposition 9-27-05.

HAYES, Gerald v. Asbestos Defendants. San Francisco Superior Court Case No. 411982. Deposition 5-9-05.

HICKS, Lucas v. Garlock Sealing Technologies. In the Circuit Court for the City of Newport News. At Law No. 38116P-03. Deposition 10-11-05.

HINES, Lambert and Maureen. San Francisco Superior Court Case No. 434266. Deposition 4-11-05.

HOFMEISTER, Cyril and Ruth v. Asbestos Defendants. San Francisco Superior Court Case No. 429369. Deposition 1-11-05.

HORR, Marian (WD: Lanny) v. Allied Packing, Inc. Alameda County Superior Court Case No. RG03104401. Deposition 6-30-05.

HOWDER, George v. Asbestos Defendants. San Francisco Superior Court Case No. 321220. Deposition 2-11-05

JEFFRIES, Ruth (WD: James) v. Garlock, Inc. Alameda County Superior Court Case No.

2002-069621. Deposition 7-1-05.

JENSEN, Alvin and Pauline v. Saberhagen Holdings, Inc. Superior Court of Washington for King County. Case No. 04-2-20249-3 SEA. Deposition 6-27-05.

JOHNSON, Daniel and Veneisa v. A.W. Chesterton Co. San Francisco Superior Court Case No. 432923. Deposition 1-5-05. Trial testimony 3-3-05 and 3-4-05.

JORDAN, James v. Asbestos Defendants. San Francisco Superior Court Case No. 402113. Deposition 8-12-05.

KAISER, Victor v. AcandS. In the Circuit Court for Baltimore City. Case No. 24X02002466, Consolidated Case No. 24X04000078. Deposition 2-21-05.

LANE, Francis and Mary v. The Dial Corporation. Los Angeles Superior Court Case No. BC 310153. Deposition 5-23-05.

LANTZ, Ernest and Malle v. Asbestos Corporation. San Francisco Superior Court Case No. 436967. Deposition 5-16-05.

LINN, David and Mary v. The Flintkote Company. Los Angeles Superior Court Case No. BC 309920. Deposition 3-30-05.

MAGER, Robert and Margaret v. Advocate Mines, Inc. San Francisco Superior Court Case No. 434307. Deposition 9-7-05.

MAIN, Ronald v. Asbestos Corporation Ltd. San Francisco Superior Court Case No. 436491. Deposition 6-6-05.

MASSIMINO, Cosmas Jack and Mary v. Asbestos Defendants. San Francisco Superior Court Case No. 412937. Deposition 4-25-05.

MASTERS, Zeddie v. Asbestos Defendants. San Francisco Superior Court Case No. 431681. Deposition 2-25-05.

McCOLLUM, Thomas v. Asbestos Defendants. San Francisco Superior Court Case No. 313994. Deposition 6-7-05.

MIKELL, Elsie (WD: Linwood) v. American Biltrite, Inc. San Francisco Superior Court Case No. 425309. Deposition 9-2-05.

MILLER, Jerry v. Asbestos Defendants. San Francisco Superior Court Case No. 418794. Deposition 3-8-05.

MORRISON, James and Sandra v. American Asbestos Co. San Francisco Superior Court Case No. 432013. Deposition 10-12-05.

O'HALLORAN, Joseph Michael v. ACandS, Inc. San Francisco Superior Court Case No. 435388. Deposition 7-8-05 and 7-19-05.

RATLIFF, Martha (WD: Beatrice Grijalva) San Francisco Superior Court Case No. 319329. Deposition 2-24-05.

RODGERS, James v. Asbestos Defendants. San Francisco Superior Court Case No. 317159. Deposition 1-12-05.

ROSEN, Debora (WD: Sherwin Rosen) v. Asbestos Corporation Ltd. San Francisco Superior Court Case No. 049017. Deposition 6-13-05.

SALYER, Joan and David v. A.W. Chesterton, et al. San Francisco Superior Court Case No. 438617. Deposition 10-10-05.

SCANDLYN, Charles and Sylvia v. Asbestos Defendants. San Francisco Superior Court Case No. 431122. Deposition 2-4-05.

SCRIVNER, Ronald v. Asbestos Defendants. San Francisco Superior Court Case No. 411286. Deposition 4-15-05.

SERRAO, Thomas and Catherine v. American Asbestos Co. San Francisco Superior Court Case No. 430560. Deposition 1-7-05.

SIAS, Estella (WD: Ralph) v. A.W. Chesterton Co. San Francisco Superior Court Case No. 416695. Deposition 2-23-05.

SILVA, Ronald and Nancy v. American Asbestos Co. San Francisco Superior Court Case No. 433253. Deposition 2-28-05.

SMITH, Larry E. and Linden v. American Asbestos Co. San Francisco Superior Court Case No. 434096. Deposition 5-16-05.

SPEICHER, Billie and May Ann v. American Asbestos Co. San Francisco Superior Court Case No. 432443. Deposition 2-18-05.

SPOONER, William v. Asbestos Defendants. San Francisco Superior Court Case No. 400033. Deposition 2-1-05.

STUTSMAN, Stanley and Audrey v. A.W. Chesterton Co. San Francisco Superior Court Case No. 434404. Deposition 3-29-05.

SURPRENANT, John (WD Bonnie Jean Surprenant) v. Atlas Turner Inc. Los Angeles Superior Court Case No. BC 271320. Deposition 5-18-05.

VANDEN BROEK, Douglas v. Asbestos Defendants. San Francisco Superior Court Case No. 436690. Deposition 9-30-05.

VAUGHN, Larry v. 3M Company. Los Angeles Superior Court Case No. BC 322230. Deposition 3-2-05.

VENT, Jo Ann, et al. v. ACandS Inc, et al. Case of KAISER, Lillian (WD: Victor Joseph Kaiser, Jr.). In the Circuit Court for Baltimore City. Consolidated No. 24X04000078. Deposition 2-21-05.

WILLIAMS, Louis and Mary v. Atlas Turner Inc. Los Angeles Superior Court Case No. BC 273051. Deposition 5-20-05.

WORTHLEY, Richard and Mickie v. Asbestos Defendants. San Francisco Superior Court Case No. 432308. Deposition 4-22-05.

ZYGIELBAUM, Paul and Michelle v. Asbestos Corporation Ltd. Alameda County Superior Court Case No. RG04152563. Deposition 6-20-05.

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ALDERETE, Dennis and Shirley v. Advocate Mines Ltd. San Francisco Superior Court Case No. 425763. Deposition 5-14-04.

AMUNDSEN, Anastasia (WD: Robert Amundsen) v. Asbestos Defendants. San Francisco Superior Court Case No. 408444. Deposition 5-20-04.

ANSELMO, Eleanor (WD: Michael Wise) v. Raybestos-Manhattan. San Francisco Superior Court Case No. 310164. Deposition 1-30-04. Trial testimony 3-23-04.

ARNO, Robert and Anna May v. A.P. Green Industries, Inc. San Francisco Superior Court Case No. 406660. Deposition 1-29-04.

BEAVER, John and Virginia v. A.W. Chesterton. San Francisco Superior Court Case No. 424112. Deposition 5-6-04.

BLISS, Robert and Barbara v. Atlas Turner, Inc. Los Angeles Superior Court Case No. BC 272884. Deposition 10-29-04.

BOUTTE, Wilmer and Jessie v. Atlas Turner Inc. Los Angeles Superior Court Case No. BC 294252. Deposition 7-8-04.

BRADEN, Richard v. ACandS. San Francisco Superior Court Case No. 422816. Deposition 3-15-04.

BURNS, William and Mary v. Asbestos Defendants. San Francisco Superior Court Case No. 426568. Deposition 4-30-04.

CADLO, Anthony and Maxlyn v. Asbestos Defendants. San Francisco Superior Court Case No. 412325. Deposition 4-2-04.

CARTER, Donnajean (WD: John) v. ACandS Inc. Alameda County Superior Court Case No. 2001-031879. Deposition 6-24-04.

CHANCE, Delores (WD: Charles) v. A.P. Green Industries, Inc. San Francisco Superior Court Case No. 322406. Deposition 1-7-04.

CREAN, Thomas v. American Honda Motor Company. Ventura County Superior Court Case No. SC037443. Deposition 5-19-04.

CROW, William v. AGCO Corporation. San Francisco Superior Court Case No. 425890. Deposition 5-21-04.

DAVIDSON, Elbert v. Burns International Services, Inc. San Francisco Superior Court Case No. 429088. Deposition 7-12-04.

DELAUTER, Robert Glenn v. A.W. Chesterton Co. Circuit Court for Baltimore City. Case No. 24X03000784. Deposition 6-14-04.

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Deposition 7-24-03.

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313714. Deposition 11-1-02.

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BAKER, Judith v. Asbestos Defendants. San Francisco Superior Court Case No. 305194. Deposition 3-13-02.

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BRAYTON GROUP 206. San Francisco Superior Court. Deposition 1-3-02.

BRAYTON GROUPS 224 and 229. San Francisco Superior Court. Deposition 11-1-02.

BRAYTON GROUP 232. San Francisco Superior Court. Deposition 12-6-02.

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Deposition 7-3-02, trial testimony 9-4-02.

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Deposition 1-31-02.

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Deposition 3-28-02.

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BRAYTON GROUP 196. San Francisco Superior Court. Deposition 8-20-01.

BRAYTON GROUP 198. San Francisco Superior Court. Deposition 11-2-01.

BRAYTON GROUP 203. San Francisco Superior Court. Deposition 12-19-01.

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Deposition 10-15-01.

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No. 311804. Deposition 1-24-01.

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Deposition 11-17-98. Trial testimony 11-7-01 and 11-8-01.

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Court Case No. 316196. Deposition 3-16-01.

ERNST, Ira. San Francisco Superior Court Case No. 314812. Deposition 7-17-01.

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Deposition 10-4-01.

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315028. Deposition 3-7-01.

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988688. Deposition 11-26-01.

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Deposition 7-27-00. Trial testimony 7-10-01.

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6. Depositions 11-14-01 and 12-6-01. Trial testimony 12-11-01.

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306874. Deposition 11-26-01.

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Case No. 745097-0. Deposition 2-7-01.

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